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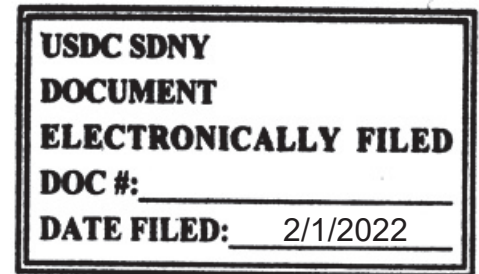
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January 31, 2022

**BY ECF**

Honorable Robert W. Lehrburger  
U.S. Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312



Re: In the Matter of the Complaint of Hapag-Lloyd Aktiengesellschaft  
a/k/a Hapag-Lloyd AG  
19-cv-05731-(GHW) (RWL)  
Our file: 2766005

Dear Judge Lehrburger:

We represent third-party defendant Ocean Network Express Pte. Ltd. ("ONE") and with reference to Your Honor's order of January 24, 2022 (ECF 753) concerning ONE's proposed motion to dismiss the non-test claims against ONE.

During Wednesday, Thursday and Friday of last week and also today, there have been numerous discussions and written exchanges with the Hill Rivkins firm (the delegate for this project for the group of firms acting for cargo interests) and the Kennedy Lillis firm (the delegate for this project for the group of firms acting for NVOCCs) about a proposed plan for a simplified and expeditious motion to obtain the Court's ruling on these claims (of which there are over 1,000). Talks have been amicable and productive. There are some details to be worked out, but counsel are optimistic that a joint proposal can be ready for submission for Your Honor's consideration in one week.

Accordingly, the parties respectfully jointly request that they be given until February 7, 2022 to submit a proposed plan for Your Honor's consideration.

Thank you for your consideration.


Respectfully submitted,

**Lyons & Flood, LLP**

By:  Randolph H. Donatelli

**SO ORDERED:**

2/1/2022

  
HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

NEW YORK

NEW JERSEY

MASSACHUSETTS